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BY ECF

The Honorable Lorna G. Schofield
United States District Judge
for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Jane Doe, et al. v. The Trump Corporation, et al.*, 18-cv-09936 (LGS)

Dear Judge Schofield:

Pursuant to the Court's order dated December 20, 2018 (ECF No. 54), the Defendants in the captioned matter are today filing and serving by ECF their Motion to Dismiss the Complaint, together with a supporting Memorandum of Law and Affirmation of Cynthia Chen, Esq. Because certain exhibits to Ms. Chen's Affirmation are video discs which "cannot be reasonably scanned" for ECF filing, we write, pursuant to Section 5.2 of the Court's Electronic Case Filing Rules & Instructions, respectfully to ask the Court's permission to file with the Court and serve Plaintiffs with hard copies of Ms. Chen's affirmation and the exhibits, in addition to proceeding by ECF.

We also write respectfully for permission to include with Ms. Chen's affirmation more than the 15 exhibits specified in Rule III.B.3 of the Court's Individual Rules and Procedures for Civil cases. Ms. Chen's affirmation runs to five pages, which is less than the 15-page limit set by the Court's rules, but it references 29 exhibits, some of which exceed the 15-page limit set by the Court for exhibits. These numbers overstate the volume of material to be included, however, because they include copies of video discs referenced in the Complaint, which, although physically one item (a DVD and its packaging), are reproduced as three exhibits: side one of the disc in question, side two of the disc, and the packaging or dressing in which the disc appears. The number of exhibits noted also includes transcripts of the DVD exhibits, which we have included as an aid to the Court and the parties, and these enlarge the number of exhibits, as well.

Hon. Lorna G. Schofield
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We note that the exhibits to Ms. Chen's affirmation all consist of video footage and ACN print material relied upon by the Plaintiffs in their Complaint or which are integral to it.

If Your Honor is inclined to grant these requests, we respectfully ask that Your Honor memo endorse this letter motion.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J. Hendon', is written over the typed name.

Joanna C. Hendon

SO ORDERED: _____

Hon. Lorna G. Schofield
UNITED STATES DISTRICT JUDGE